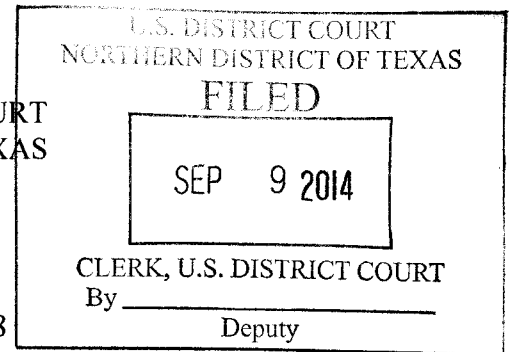


REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:14-MJ-378

JESUS GERARDO
LEDEZMA-CAMPANO (01)
JOSE LUIS CEPEDA-CORTES (02)

CRIMINAL COMPLAINT

I, [REDACTED], being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Beginning on or about March 1, 2011, and continuing until on or about May 22, 2013, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants **Jesus Gerardo Ledezma-Campano and Jose Luis Cepeda-Cortes**, and others, traveled in interstate and foreign commerce from Mexico to Southlake, Texas, and elsewhere, with the intent to kill J.J.G.C., and in the course of and as a result of such travel, placed J.J.G.C., and his spouse, in reasonable fear of the death of and serious bodily injury to J.J.G.C.

In violation of Title 18, United States Code, Section 2261A, Stalking.

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been so employed for approximately nine years and am currently assigned to the FBI Field Office in Dallas, Texas, designated to the Fort Worth Resident Agency on a Criminal Enterprise Squad working with a Violent Crime/Gang Task Force (hereinafter referred to as the Task Force). The Task Force is comprised of agents, investigators, and police officers from the FBI, the Texas

Department of Public Safety (DPS), the Arlington, Texas Police Department (APD), and the Fort Worth, Texas Police Department (FWPD). As an FBI Special Agent, I am charged with the duties of investigating violations of criminal laws of the United States, to include 18 USC § 2261A, Stalking.

2. The information set forth in this affidavit is true and correct to the best of my knowledge and was obtained from records, witnesses, and other law enforcement officers, agents, or analysts. This affidavit does not set forth all of my knowledge about this investigation.

Probable Cause

3. On May 22, 2013, J.J.G.C. (hereafter referred to as the victim) was murdered in Southlake Town Square in Southlake, Texas while seated in a Range Rover used by the victim and his wife. Eyewitnesses and video surveillance identified a Toyota Sequoia as the vehicle used by the victim's assailants. Video surveillance showed an unknown individual exit the rear passenger side of the Sequoia after it pulled behind the victim's vehicle and walk around the passenger side of the victim's vehicle where he was sitting. The victim was killed as the result of multiple gunshot wounds from a 9mm pistol.

4. During the course of the investigation, investigators located a surveillance tracking device on the undercarriage of the victim's Range Rover. After contacting the company that provided the tracking service, investigators learned there were six total devices associated with the same account as the device located on the victim's vehicle.

5. Using the data obtained from the tracking device, as well as mobile phone data, investigators were able to re-create the various locations and dates of the vehicles of several

individuals who participated in the stalking and subsequent murder of the victim, to include **Ledezma-Campano** and **Cepeda-Cortes**.

6. On March 05, 2013, **Ledezma-Campano** and his father Jesus Gerardo Ledezma-Cepeda traveled from Mexico to the United States. **Ledezma-Campano** and Ledezma-Cepeda continued to travel north on March 06, 2013, until they reached Grapevine, Texas. The trackers traveled to Grapevine, Texas, and went directly to the residence of [REDACTED].

7. **Cepeda-Cortes** used his email accounts to send and receive information in an effort to locate the victim. Some information exchanged using the email accounts associated with **Cepeda-Cortes** included personal information of the victim's family, photographs of the victim's residence, vehicles associated with the victim's family, and the victim's personal information. Two residences rented by **Cepeda-Cortes**, one in Florida and one in the Dallas/Fort Worth area, were used to house the co-conspirators and himself while they were tracking the victim. **Cepeda-Cortes** used his name, phone number and address to rent the residences.

8. On March 16 and 17, 2013, **Cepeda-Cortes** sent and received several e-mails with the management of [REDACTED], located in Grapevine, Texas, for the rental of a one bedroom, one bath apartment. In one e-mail on March 17, 2013, **Cepeda-Cortes** sent an email to [REDACTED] management and wrote, "May this serve as consent and permission to deliver the keys for [REDACTED] to Jesus Ledezma. Thank you, JOSE L CEPEDA, SSN[REDACTED]." Photo line-ups were shown to [REDACTED] who positively identified both Ledezma-Cepeda and **Ledezma-Campano**.

9. [REDACTED]

[REDACTED]

[REDACTED]. Records indicate that on both days the [REDACTED] were utilized by [REDACTED] [REDACTED] device described above in paragraph four, which is subscribed to **Cepeda-Cortes**.

10. From March 17, 2013 to April 02, 2013, trackers were utilized by the subjects both in their own vehicles and on the vehicles owned and operated by [REDACTED]. The trackers that were on [REDACTED] vehicles were again observed to stay at [REDACTED] residence in Grapevine, Texas during the evenings and travel to [REDACTED] during the day and, at times, at night. On March 29, 2013, a tracker was on [REDACTED] vehicle as it traveled to the victim's residence in Southlake, Texas at 9:56 a.m. and again at 3:04 p.m. The tracker went to the victim's residence on March 30, March 31, and April 01, 2013.

11. A search of the victim's [REDACTED] on June 26, 2013, revealed that the same tracker previously used on [REDACTED] vehicle was discovered hidden between the rear bumper and the spare tire holder.

12. On April 13, 2013, records indicated **Ledezma-Campano** entered the United States at the Anzalduas Port of Entry; records for [REDACTED] indicated the cellular telephone also began making outgoing calls within the Rio Grande Valley. At approximately 12:30 p.m., records indicated [REDACTED] was in the Dallas-Fort Worth area. Investigators believe **Ledezma-Campano** utilized the phone number [REDACTED].

13. Between April 29, 2013 and May 1, 2013, cellular telephones and e-mail addresses used by **Ledezma-Cepeda** and **Ledezma-Campano** received emails and MMS-

messaging (picture text messaging) from a game camera that had been purchased by **Cepeda-Cortes** and shipped to the apartment in Grapevine used by the co-conspirators. The camera was placed in various locations in the victim's neighborhood, but was primarily set to record vehicles as they exited the housing development. The victim's Range Rover and the [REDACTED] registered to the [REDACTED] were captured by the camera. The camera also captured and transmitted a test image as the camera was being set up; in the photograph is a white [REDACTED], matching the description of a vehicle that had been rented by Ledezma-Cepeda from [REDACTED].

14. On May 17, 2013, **Ledezma-Campano** flew from Monterrey, Mexico to DFW International Airport on [REDACTED].

15. During the time frame of March 15, 2013 to May 23, 2013, when Ledezma-Cepeda and **Ledezma-Campano** were in the DFW area tracking the victim, they purchased two known vehicles. The first vehicle was a [REDACTED], purchased for \$3,300.00 on April 22, 2013. Both Ledezma-Cepeda and **Ledezma-Campano** have been positively identified as the purchasers of the [REDACTED].

16. The second purchased vehicle was a [REDACTED], purchased for \$3,900.00 cash on May 02, 2013. Ledezma-Cepeda was positively identified from a photo line-up as the person who purchased the [REDACTED].

17. Records show that Ledezma-Cepeda and **Ledezma-Campano** had at least three vehicles at [REDACTED] that they utilized to run errands and drive around the DFW area, while at the same time utilizing five [REDACTED] cars from March 8 to May 23, 2013. Investigators believe that Ledezma-Cepeda and **Ledezma-Campano** changed vehicles often and used non-descript rental vehicles to avoid detection from the victim and his family.

18. On May 22, 2013, the day of the victim's murder, one tracker was on the victim's Range Rover, and another tracker was with the subjects. These were the only active trackers in the DFW area at that time.

19. Early in the afternoon of May 22, 2013, [REDACTED], the cellular telephone believed to be used by **Ledezma-Campano**, made an outgoing call utilizing [REDACTED] cell tower located less than a mile from the victim's residence. This was the last call made by this cell phone until 9:11 p.m. on May 22, 2013.

20. At approximately 5:57 p.m., the tracker showed the victim and his wife arrived at Southlake Town Square. At approximately 6:05 p.m., a different tracker showed that another vehicle traveled south on Grand Avenue past the victim's Range Rover. Southlake Town Square video showed what appeared to be [REDACTED] drive south on Grand Avenue past the victim's Range Rover at approximately 6:05 p.m. The victim and his wife walked to a shoe store at 6:15 p.m. and arrived back at their Range Rover at 6:46 p.m.

21. The victim went to the passenger side of the Range Rover and his wife went to the rear driver side to place bags in the vehicle. At approximately 6:45 p.m., a Sequoia was seen on a surveillance camera and moved into the street to prevent traffic from getting in front of the Sequoia. At approximately 6:47 p.m., the Sequoia pulled up directly behind the Range Rover. Because of the position of the camera, the video only showed the back door open and a person exit. Approximately six seconds later the Sequoia drove away and the victim was dead.

22. At approximately 6:49 p.m. the Sequoia was recorded by a video camera at the fire department driving north on Carroll Avenue. At approximately 6:53 p.m. the [REDACTED] [REDACTED] was seen on the same camera going north on Carroll Avenue.

23. At 10:28pm, **Ledezma-Campano** called Ledezma-Cepeda. At the time of this phone call, Ledezma-Cepeda's phone pinged off a cell tower that is approximately 7/10ths of a mile from [REDACTED]. During this call, **Ledezma-Campano's** cellular telephone also used cell towers within a half mile of [REDACTED]. A Toyota Sequoia, matching the year and color of the vehicle used in the murder was found abandoned at [REDACTED] on June 20, 2013. According to employees of [REDACTED], the vehicle had been in the employee parking lot, without being moved, for at least three weeks.

24. At 6:28 a.m. on May 23, **Ledezma-Campano** called Ledezma-Cepeda. At 7:33am, [REDACTED] was turned in to [REDACTED] at [REDACTED]. [REDACTED] records show that although Ledezma-Cepeda had [REDACTED] the [REDACTED] for a week, after the murder of the victim on May 22, 2013, the [REDACTED] was returned to [REDACTED].

25. Based upon the aforementioned facts I believe that **Jesus Gerardo Ledezma-Campano and Jose Luis Cepeda-Cortes**, have committed the offense of Stalking in violation of Title 18, United States Code, Section 2261A.

[REDACTED]
[REDACTED]
Federal Bureau of Investigation

Sworn and subscribed to me this 5th day of September, 2014 at 3:39 p.m in Fort Worth, Texas.


JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE